

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
(Harrisonburg Division)

UNITED STATES :  
v. : Case No. 5:23-CR-06 (TTC)  
HECTOR MANUEL ESPINOSA :  
Defendant :

**UNOPPOSED MOTION TO CONTINUE  
FILING DEADLINE FOR ONE BUSINESS DAY**

Defendant Hector Manuel Espinosa respectfully moves this Court for a one business day continuance of the deadline for filing of response to this Court's Order of January 14, 2025. Since receiving the Order, undersigned have independently consulted with outside counsel to obtain legal advice, but those discussions are not yet complete.

Undersigned corresponded with the Government and represents that the prosecution does not object to the one business day continuance. The brief one-day delay until January 20, 2025 should not affect the current post-trial litigation schedule.

A Proposed Order is attached hereto.

Respectfully submitted,

/s/ *Sandi S. Rhee*

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/s/ *Robert Feitel*

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via ecf to Ronald M. Huber and Sean Welch, Assistants United States Attorney for the Western District of Virginia, this 17th day of January, 2025

/s/ *Robert Feitel*

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Sandi S. Rhee